

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
2000 Biennial Regulatory Review --)	
Comprehensive Review of the)	CC Docket No. 00-199
Accounting Requirements and)	
ARMIS Reporting Requirements for)	
Incumbent Local Exchange Carriers:)	
Phase 2)	
)	
Amendments to the Uniform System)	CC Docket No. 97-212
of Accounts for Interconnection)	
)	
Jurisdictional Separations Reform and)	CC Docket No. 80-286
Referral to the Federal-State Joint Board)	
)	
Local Competition and Broadband Reporting)	CC Docket No. 99-301

**Comments of
The Indiana Utility Regulatory Commission
On the
FURTHER NOTICE OF PROPOSED RULEMAKING**

The Indiana Utility Regulatory Commission (“IURC”) is deeply involved in the effort to promote competition and to reduce regulation in order to secure lower prices and higher quality services for telecommunications consumers and encourage the deployment of new telecommunications technologies. We want to encourage competition, but we believe that the elimination or even significant reduction of the uniform accounting and reporting requirements is premature at this point and will actually be detrimental to developing competition. We believe that accounting and reporting requirements should be the last requirements that are removed and that they should not be eliminated before competitors have had the chance to get a strong foothold and a finding of non-dominance has been made for the ILECs.

The IURC has, in recent years, found the uniformity and comparability of accounting and ARMIS data, that is currently available through the FCC’s website, to be very useful and irreplaceable in our work on several cases before our commission. Comparisons between different ILECs and between different states for the same ILEC have been important in many recent cases concerning issues such as service quality, infrastructure deployment and mergers. If states are left to create their own reporting requirements, the comparability, which is so important, will be lost. Therefore, we fully support and adopt as our own, the comments filed by the NARUC.

Submitted on behalf of

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